IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA RALEIGH DIVISION

IN RE: CHAPTER 11

SOUTHERN PRODUCE DISTRIBUTORS, INC.,

CASE NO. 18-02010-5-SWH

Debtor.

MOTION FOR PRIVATE SALE OF REAL PROPERTY FREE AND CLEAR OF LIENS

NOW COMES Southern Produce Distributors, Inc., Chapter 11 Debtor-in-Possession herein ("Debtor"), and hereby moves the Court, pursuant to 11 U.S.C. § 363, for entry of an Order authorizing and allowing the private sale of certain real property, plus all improvements and all rights appurtenant thereto, owned by the Debtor, consisting of real property located in Oak Grove and Forest, West Carroll Parish, Louisiana, free and clear of liens or encumbrances (except for ad valorem taxes which will be pro rated to date of closing), to Mike Thompson, Purchaser. In support of this Motion, the Debtor respectfully shows the Court the following:

- 1. The Debtor filed a voluntary petition under Chapter 11 of the United States Bankruptcy Code on April 20, 2018 ("Petition Date") and has been operating as a Debtor-in-Possession since that date.
- 2. The Debtor owns parcels of real property consisting of: (i) approximately 234 acres, more or less, Sections 26 & 27, Township 21N, Range 10E, crop land known as Allsbrook Farm located in Oak Grove, West Carroll Parish, Louisiana (the "Allsbrook Farm Property"), further identified by Parcel No. 0300244750; and (ii) three lots, and all improvements, located at 8207 Highway 17, Forest, West Carroll Parish, Louisiana, further identified by Parcel No. 0300269855 (the "Forest Lots") (collectively, the "Real Property").
- 3. Upon information and belief, the Real Property is unencumbered. The Real Property is not presently used in Debtor's business operations and is not necessary to Debtor's continued business operations.
- 4. The Debtor has received an offer ("Offer") to purchase the Real Property from Mike Thompson, P.O. Box 340, Hartley, Texas 79044, or his assigns, ("Purchaser"), for a purchase price of one million one hundred thousand dollars (\$1,100,000.00) (the "Purchase Price"), subject to: (i) ad valorem taxes for the subject property, (ii) reasonable and normal costs of closing, including, without limitation, reasonable costs or expenses of sale required to be paid by the Reorganized Debtor as the seller pursuant to the respective sale contract. The net sale proceeds received from the sale shall be subject to the following uses: (i) Quarterly Fees generated by the sale when and as applicable, (ii) reasonable attorney fees relating to the sale and closing, and (iii) applicable capital gain taxes when and if applicable. The sale and Purchase Price are

subject to a real estate broker commission. A copy of the Contract to Buy and Sell is attached to this Motion as Exhibit 1.

- 5. The Allsbrook Farm Property was appraised for John C. Hine, Executor of the Estate of David Stewart Precythe, by Don Lockard, Louisiana Certified General Real Estate Appraiser, on April 11, 2018 at a farm value, and for estate purposes, approximating \$608,000.00. The Forest Lots was appraised for John C. Hine, Executor of the Estate of David Stewart Precythe, by Don Lockard, Louisiana Certified General Real Estate Appraiser, on April 20, 2018 for estate purposes, approximating \$44,600.00.
- 6. The sale of Debtor's Real Property is actually a "package" sale of two unencumbered parcels owned by the Debtor in Louisiana, and five other parcels located in Louisiana owned or controlled by the Estate of David Stewart Precythe, deceased, for a total purchase price of \$4.6 million. Of that total purchase price, the allocated purchase price for the Debtor is \$1.1 million. The Purchaser wants to effectuate an exchange qualifying Under Internal Revenue Code Section 1031, at no cost to Seller, with a requested closing date of May 31, 2018.
- 7. The consummation of the entire \$4.6 million package sale (involving two parcels owned by the Debtor and approximately five other parcels owned or controlled by the Estate of David Stewart Precythe will also result in the reduction of a Debtor owed indebtedness to Byline Bank of approximately \$1.8 million from non-debtor, third party collateral.
- 8. Debtor intends to set aside the net sale proceeds received from the closing on the Offer, and preserve such funds for use and application pursuant to its Plan of Reorganization.
- 9. The best interests of the Debtor, its creditors and the estate will be served by the allowance of this Motion.

WHEREFORE, the Debtor respectfully requests the Court for entry of an Order:

- 1. Allowing and approving of this Motion.
- 2. Approving, authorizing, and directing the sale of the Real Property, plus all improvements and all rights appurtenant thereto, to Mike Thompson or his assigns, as Purchaser, free and clear of liens or encumbrances (except for ad valorem taxes which will be pro rated to date of closing), subject to (i) ad valorem taxes for the subject property, and (ii) reasonable and normal costs of closing, including, without limitation, reasonable costs or expenses of sale required to be paid by the Debtor as the seller pursuant to the respective sale contract. The net sale proceeds received from the sale shall be subject to the following uses: (i) Quarterly Fees generated by the sale when and as applicable, (ii) reasonable attorney fees relating to the sale and closing, and (iii) applicable capital gain taxes when and if applicable.
 - 3. For such other and further relief as the Court may deem appropriate.

Respectfully submitted this 11th day of May, 2018.

s/Gregory B. Crampton

Gregory B. Crampton State Bar No. 991

Kevin L. Sink

State Bar No. 21041

Steven C. Newton, II

State Bar No. 44656

NICHOLLS & CRAMPTON, P.A.

Post Office Box 18237

Raleigh, North Carolina 27619

Telephone: (919) 781-1311

Attorneys for Debtor

CONTRACT TO BUY AND SELL

BE IT KNOWN AND REMEMBERED that on the dates hereinafter set forth and before the undersigned competent witnesses and Notaries Public, personally came and appeared:

- 1. Estate of David Stewart Precythe represented by its duly authorized executor, John Hine, and Southern Produce Distributers, Inc., represented by its Vice President, John Hine, hereinafter referred to as SELLER; and
- 2. Mike Thompson, a resident of Hartley County, Texas, with an address of P.O. Box 340, Hartley, TX 79044, or his assigns, hereinafter referred to as BUYER,

who declare and acknowledge that they have and do by these presents enter into a "Contract to Buy and Sell" ("Agreement") as follows, to-wit:

Seller agrees to sell to Buyer and Buyer agrees to buy from Seller for the price and consideration and upon the terms and conditions hereinafter set forth the following described Property situated in West Carroll Parish, Louisiana ("Property"), to-wit:

SEE ATTACHED EXHIBIT "A"

The price and consideration for which this sale and purchase shall be made and the terms and conditions thereupon which the same shall be consummated are set forth as follows, to-wit:

- a) The consideration for this sale is the sum of FOUR MILLION SIX HUNDRED THOUSAND AND NO/100 (\$4,600,000.00) DOLLARS, which is to be paid in cash on the closing date to be not later than March 29, 2018. Upon execution of this Contract to Buy and Sell by both parties, Buyer shall deposit the sum of \$50,000,00 into the Cotton & Bolton Trust Account to be held to be applied toward the purchase price on date of closing.
- b) Thile curative work, if any be necessary shall be paid by Seller, and Seller shall provide deed.
- c) Seller shall provide to Buyer all existing plats of surveys of the Property in its possession. Seller acknowledges that the portion of the property herein described and known as Whatley Farm is landlocked and agrees to provide a dedicated access easement to Buyer and its successors and assigns at closing. Should Seller be unable to provide such, then Buyer may, if so elected, terminate this contract, with full refund of deposit.
- d) The parties agree that Seller shall lease the farmland on the Property for 2018 and Seller agrees to disclose the terms of the lease or leases to Buyer. All lease proceeds attributable to the farmland for 2018 shall be prorated between Buyer and Seller. Seller authorizes Buyer to access the Property post-closing in a manner which will not adversely affect the operations of tenant of Seller. Buyer shall take possession of the Property at closing subject to leases on certain portions of the property.
- e) The Seller warrants that it owns a good and merchantable title in and to the Property and agrees to deliver title without any mortgages, liens and encumbrances of any nature or kind; except recorded servitudes; easements and rights-of-way, including but not limited to the Agricultural Leases disclosed to Buyer and referenced above.

- the Within thirty (30) days of the execution of this Agreement, Buyer shall have the title of the hereinabove Property examined by an attorney and a written opinion rendered thereon. If curative work, as to title, is deemed necessary, a copy of said written title opinion shall be furnished Seller, and in the event that such requirements cannot be reasonably fulfilled by the Seller, then this contract may be terminated with all parties hereunto being relieved of all obligations hereunder. In the event that such requirements are not fulfilled within forty-five (45) days after receipt of requirements by Buyer's attorney, the Buyer may, if so elected, terminate this contract, with full refund of deposit.
- g) The Act of Sale shall be with full and general warranty of title on a standard Louisiana Warranty Deed.
- h) It is agreed between the parties that the taxes for 2018 shall be prorated between Seller and Buyer.
- i) Seller expressly disclaims any obligation after the date of closing to maintain or repair the Property, which Property shall be expressly transferred "AS IS" and "WHERE IS" and without any warranties or representations as to suitability and fitness for intended use.
- Buyer shall perform all due diligence, investigation, and inspections regarding the Property, including but limited to title work, determination of property and other applicable taxes, access to public roads and utilities, and all other matters and circumstances of significance to Buyer, within thirty (30) days of the execution of this Agreement. Buyer acknowledges that Seller has not nor will be called upon to make any warranties or representations regarding any matter, fact, or circumstance except as expressly provided in Section (g) above. During the due diligence period, the Buyer may cancel this contract for any reason deemed necessary by the Buyer. If Buyer cancels for any reason other than issues of title or access, Seller shall retain the deposit.
- k) The parties agree that this sale shall be by means of an exchange of "like-kind" property and desire that this transaction qualify as such under Section 1031 of the Internal Revenue Code of 1986 and regulations thereunder, as amended. Setter and Buyer shall cooperate in the execution of such documents as are reasonably necessary to effectuate an exchange qualifying under Internal Revenue Code Section 1031, at no cost to Setter.
- Seller shall retain rights to minerals in and under the Property but agrees to exercise its rights in the manner least intrusive to Buyer's use and enjoyment of the surface of the property.
- m) Covenant One Realty represents both Buyer and Seller as broker in this transaction.

 Seller and Buyer and each of them are expressly granted the right of specific performance herein, and this agreement shall be binding upon the Seller and Buyer, and their respective heirs, legatees, and assigns.

The remainder of this page is intentionally left blank.

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STATE	Ur-	NORTH	CARO	PHAY.

COUNTY OF WAY VE

THUS DONE AND SIGNED as to the Seller in the presence of the undersigned Notary

Public and competent witnesses on the ______ day of ________

The Estate of David Stoward Precythe, Seller

Denise M. allison

27 C

BY: John Hine, Executor

Denise M. Allison

ma & Boder

Southern Produce Distributors, Inc., Seller

Debra J. Pender

~

Y: John Hine Vice President

Print Name

AUGUSTON AND THE

Ogo

ener_m

14 Commission

expires : 1-19-2005

STATE OF LOUISIANA:

PARISH OF RICHLAND:

THUS DONE AND SIGNED as to the Buyer in the presence of the undersigned competent

MIKE THOMPSON, BUYER

witnesses and Notary Public on the S day of February 201

WITNESSES:

Cathy Cooper

CAthy Cooper

Riley Bridges

Riley Bridges
Printed Name

NOTARY PUBLIC

OPHICIALISE ...
THOMAS E. ALLEN
LSBA NO. 21992
NOTARY PUBLIC NO. 40473
STATE OF LOUISIANA
PARISH OF MOREHOUSE
My Commission is for Ufs

Exhibi+A

Farms List

Witcher Farm- 218 Acres
135 Acres Irrigated Land Formed
50 Acres Non-irrigated
33 Non-tillable
2 wells

Includes Reingeration building, packing house, office, storage warehouse, machine shed

Alsbrook Farm- 249 Acres (500)
110 Acres Inigated by pivot belonging to farmer
102 Acres Non-irrigated
37 Non-tillable
1 well

Whatley Farm-55 Acres
52 Acres Irrigated 54 Precision Leveled
4 Acres Non-Irrigated
9 Non-tillable
1 wells

Roberts/Mointosh Farm- 152 Acres
137.7 Non-Irrigated acres
24.5 Non-tillable

Beyins Farm- 408 Acres
200 Acres Infigated 160 Row Fall
116.8 Acres Non-Irrigated
91.2 Non-fillable
2 wells

6 - 8207 HWY17 Forest, LA71242 2Lots and all improvements

0 - 6433 Huy 2 Dak brove, CH
9 acres and all improvements

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing MOTION FOR PRIVATE SALE OF REAL PROPERTY FREE AND CLEAR OF LIENS was served this day by placing a copy thereof in a depository under the exclusive care and custody of the United States Postal Service in a postage prepaid envelope and properly addressed as follows:

VIA CM/ECF E-MAIL SERVICE ONLY
Brian Behr
Office of the Bankruptcy Administrator
434 Fayetteville Street, Suite 640
Raleigh, NC 27601

This the 11th day of May, 2018.

<u>s/Phyllis Hill</u>
Phyllis Hill
Paralegal

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA RALEIGH DIVISION

IN RE: CHAPTER 11

SOUTHERN PRODUCE DISTRIBUTORS, INC.,

CASE NO. 18-02010-5-SWH

Debtor.

NOTICE OF MOTION AND HEARING

NOTICE IS HEREBY GIVEN of the MOTION FOR PRIVATE SALE OF REAL PROPERTY FREE AND CLEAR OF LIENS ("Motion") filed simultaneously herewith by Southern Produce Distributors, Inc., Chapter 11 Debtor-in-Possession herein ("Debtor"), seeking the entry of an Order authorizing and allowing the private sale of certain real property, plus all improvements and all rights appurtenant thereto, owned by the Debtor, consisting of: (i) approximately 234 acres, more or less, Sections 26 & 27, Township 21N, Range 10E, crop land known as Allsbrook Farm located in Oak Grove, West Carroll Parish, Louisiana (the "Allsbrook Farm Property"), further identified by Parcel No. 0300244750, West Carroll Parish Registry; and (ii) three lots, and all improvements, located at 8207 Highway 17, Forest, West Carroll Parish, Louisiana, further identified by Parcel No. 0300269855 (the "Forest Lots") (collectively, the "Real Property"), free and clear of liens or encumbrances (except for ad valorem taxes which will be pro rated to date of closing), to Mike Thompson, or his assigns, for a purchase price of \$1,100,000.00, with such purchase being subject to a real estate broker commission.

FURTHER NOTICE IS HEREBY GIVEN that **any objection to the Motion must be filed** with the Clerk, United States Bankruptcy Court, P.O. Box 791, NC 27602, with a copy served on the Debtor's counsel whose names appear at the bottom of this Notice, **on or before 5:00 pm on May 29, 2018** [the applicable Notice Period was reduced to a eighteen day period, inclusive of the three days for mailing, by Order entered May 11, 2018]; and

FURTHER NOTICE IS HEREBY GIVEN that if an objection is filed, **a hearing** on the Motion for Private Sale of Real Property Free and Clear of Liens and any responses thereto, **shall be held** at **10:00 a.m., May 30, 2018** in the United States Bankruptcy Court, Eastern District of North Carolina, 300 Fayetteville Street, Second Floor Courtroom, Raleigh, North Carolina 27602.

DATE OF NOTICE: May 11, 2018. s/Gregory B. Crampton

Gregory B. Crampton.
Gregory B. Crampton, State Bar No. 991
Kevin L. Sink, State Bar No. 21041
Steven C. Newton, II, State Bar No. 44656
NICHOLLS & CRAMPTON, P.A.
Post Office Box 18237
Raleigh, North Carolina 27619
Telephone: (919) 781-1311
Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA RALEIGH DIVISION

IN RE: CHAPTER 11

SOUTHERN PRODUCE DISTRIBUTORS, INC.,

CASE NO. 18-02010-5-SWH

Debtor.

CERTIFICATE OF MAILING

I, Phyllis Hill of Nicholls & Crampton, P.A., Post Office Box 18237, Raleigh, North Carolina 27619, certify:

That on the 11th day of May, 2018, I mailed copies of the **NOTICE OF MOTION AND NOTICE OF HEARING** with regard to the MOTION FOR PRIVATE SALE OF REAL PROPERTY FREE AND CLEAR OF LIENS to each party appearing in this case file as shown on the attached mailing matrix by CM/ECF electronic e-mail service or by placing said copy in the United States Mail, postage prepaid.

I certify under penalty of perjury that the foregoing is true and correct.

This 11th day of May, 2018.

s/Phyllis W. Hill

Phyllis W. Hill Paralegal NICHOLLS & CRAMPTON, P.A. Post Office Box 18237 Raleigh, North Carolina 27619 Telephone: (919) 781-1311

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(p)INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346 PHILADELPHIA PA 19101-7346 AAA Scale Company PO Box 7056 Wilson, NC 27895-7056 ACF FinCo I LP 580 White Plains Road, 6th Floor Tarrytown, NY 10591-5153

Aflac 1932 Wynnton Road

Columbus, GA 31993-0797

Ag America Lending P.O. Box 933076

Cleveland, OH 44193-0034

AG- Pak, Inc. 8416 State Street PO Box 304

Gasport, NY 14067-0304

Agriculture Program Services, Inc.

PO Box 801

Warsaw, NC 28398-0801

Allco Electric, Inc. PO Box 427

La Grange, NC 28551-0427

Alvis & Mary Lou Denning 200 Shepherd St.

Raleigh, NC 27607-4030

American Industries, Inc.

PO Box 1405

Lumberton, NC 28359-1405

Ares Management, successor to FCC, LLC d/b/a First Capital 800 Corporate Pointe, 4th Floor Los Angeles, CA 90230-7667

AT&T

PO Box 105262 Atlanta, GA 30348-5262

Atlantic Coast Toyota Lift

PO Box B High Point, NC 27261-1919 Axis Corrugated Container, LLC

201 Industrial Drive Butner, NC 27509-2511 B. C. Roberts Electric Company Inc.

411 Bill Clifton Road Faison, NC 28341-8729

Bankruptcy Administrator Two Hannover Square, Ste. 640 434 Fayetteville Street

Raleigh, NC 27601-1701

Bass Boyz Family Farm 618 Emmett Jackson Road Faison, NC 28341-7518 Bernie Langdon P O Box 848 Selma, NC 27576-0848

Black, Chestnut & Johnson, P.A.

PO Box 588

Clinton, NC 28329-0588

Blake Gary Adams 247 Five Points Road Benson, NC 27504-7031 Blueview Farms 122 Dairy Road Dunn, NC 28334-1650

Boone Hall Plantation & Gardens

1235 Long Point Road

Mount Pleasant, SC 29464-9020

Brian & Marcus Lee 758A Shaws Pond Road Four Oaks, NC 27524-9152

Brian Behr

Bankruptcy Administrator, EDNC 434 Fayetteville Street, Suite 640 Raleigh, NC 27601-1888

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Brian C. Fork

Brooks Pierce McLendon Humphrey Leonard

PO Box 1800

Raleigh, NC 27602-1800

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Brian D. Darer

Parker, Poe, Adams, Bernstein, LLP

PO Box 389

301 Fayetteville Street, Suite 1400

Raleigh, NC 27601-2172

500 W. Elm Grove Road, Suite 104 Elm Grove, WI 53122-2546

Byline Bank, successor

to Ridgestone Bank

Can-Am Pepper Company LP Cape Fear Farm Credit ACA

P.O. Box 558

Clinton, NC 28329-0558

Cape Fear Farm Credit, ACA

Nexsen Pruet

4141 Parklake Avenue, Suite 200 Raleigh, NC 27612-2333

52999 John Wise Line Aylmer, Ontario N5H 2R5

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Carolina Eastern-Benson, Inc. 8858 NC 96 South Benson, NC 27504 Carolina Vegetables, Inc. c/o John C. Hine, Executor P.O. Box 916 Goldsboro, NC 27533-0916 Caroplast, Inc. PO Box 668405 Charlotte, NC 28266-8405

Carr, Riggs & Ingram, LLC 2805 North Park Drive PO Box 10588 Goldsboro, NC 27532-0588

Catherine G. Clodfelter
Parker Poe Adams & Bernstein LLP
PO Box 389
Raleigh, NC 27602-0389

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Century Link PO Box 4300 Carol Stream, IL 60197-4300

CHEP 8517 South Park Circle Orlando, FL 32819-9062 City of Duplin Economic Development P.O. Box 910

Clegg's Terminte & Pest Control,LLC PO Box 3089

P.O. Box 910

Kenansville, NC 28349-0910

Durham, NC 27715-3089

CMS Farms Strickland Organics 891 Country Club Road Salemburg, NC 28385-9442 Convergent Technologies, Inc. PO Box 513 Pfafftown, NC 27040-0513 County of Duplin
P.O. Box 966
Venensyille, NC 2834

Kenansville, NC 28349-0966

Crop Production Services-Albertson 2954 North NC 111 & 903 Hwy Albertson, NC 28508-9634 Cumberland County Tax Administrator P.O. Box 449 Fayetteville, NC 28302-0449 CW Hendrix Farms 21715 Cartagena Drive Boca Raton, FL 33428-2857

D & T Farms Inc. 8008 NC Hwy 96 S Benson, NC 27504-7222 D&B Welding Supplies 6274 NC 403 West Mount Olive, NC 28365 VIA CM/ECF EMAIL SERVICE ONLY

David A. Garland

Moore Clarke DuVall & Rodgers, P.C.

PO Drawer 71727 Albany, GA 31708-1727

David Pennington Construction 6274 NC 403 West Mount Olive, NC 28365 Del Al Associates, Inc. 880 Flordon Dr.

Charlottesville, VA 22901-7810

Dewitt Produce PO Box 129

Morven, GA 31638-0129

Dillon Supply Company PO Box 896595

Charlotte, NC 28289-6595

VIA CM/ECF EMAIL SERVICE ONLY Douglas R. Ghidina

Moore & Van Allen, PLLC 100 N. Tryon Street, Suite 4700 Charlotte, NC 28202-4003 Duplin County Tax Administrator

P.O. Box 968

Kenansville, NC 28349-0968

East Coast AGRI-Technologies, Inc.

3164 Gov. Moore Rd. Clinton, NC 28328-9585 Edward Myrick Produce, Inc. 1255 West Atlantic Blvd., Suite 320 Pompano Beach, FL 33069-2945 Electric Supply CO of NC, Inc.

PO Box 1968

Wilson, NC 27894-1968

Employment Security Commission

PO Box 26504

Raleigh, NC 27611-6504

Estate of David Stewart Precythe John C. Hine, Executor P.O. Box 916

Goldsboro, NC 27533-0916

Eticon Consultants Limited 298 Gienroy Gilbert Drive, Suite 32 Ottawa. Ontario K2J 5W2

Canada

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ETICON CONSULTANTS LTD 298 Glenroy Gilbert Drive, Suite 302 Ottawa, ON. K2J 5W2 CANADA Farm Credit Leasing Services Corp. NW-9675 P.O. Box 1450 Minneapolis, MN 55485-1450 Fastener Supply of Goldsboro 1219 South US Hwy 117 PO Box 1597 Goldsboro, NC 27533-1597

Fasteners Supply Of Goldsboro P.O. Box 1597 Goldsboro, NC 27533, NC 27533-1597 Fireman's Fund Insurance Companies Dept. CH 10284 Palatine, IL 60055-0001 Fiske Union Water Systems, Inc. PO BOX 336 Oak Grove, LA 71263-0336

Giddy Up Incorporated 1401 Central Ave., Suite 200-B Charlotte, NC 28205-5366 Glen Rose Transportation Management PO Drawer 3269 1601 Glen Rose, TX 76043-3269 Global Sensors P.O. BOX 750 Belmont, NC 28012-0750

Hagan Electronics, Inc. PO Box 17385 Reno, NV 89511-7385 Hanover Electric Motor & Supply,Inc 602 Wellington Avenue Wilmington, NC 28401-7699 Hanover Electric Motors & Supply Inc. 602 Wellington Ave Wilmington, NC 28401-7699

Harvey Farms 360 Bill Smith Road Kinston, NC 28501-9514 Heiden & Associates, LLC 107 Poplar Ridge Drive Goldsboro, NC 27534-7805 Herc Rentals P.O. Box 936257 Atlanta, GA 31193-6257

Hill Top Farms, Inc. 6341 Strickland's Crossroads Rd Four Oaks, NC 27524-9560

Honeycutt Enterprise, Inc. 187 Hudsontown Rd. Dunn, NC 28334-7500 Howell Farming Co., Inc. 164 Frankies Lane Goldsboro, NC 27530-9510

Independent Container Line, LTD. 5620 Cox Road Glen Allen, VA 23060-9266 Industrial Power, Inc. 703 Whitfield Street Fayetteville, NC 28306-1617 Internal Revenue Service Alamance Building, Mail Stop 24 4905 Koger Blvd. Greensboro, NC 27407-2734

Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346 International Paper Lock Box 0644095 Pittsburgh, PA 15264-4095 iTrade Network, Inc. PO Box 935209 Atlanta, GA 31193-5209

J & J Produce, Inc. dba J & J Family of Farms 4003 Seminole Pratt Whitney Road Loxahatchee, FL 33470-3754 J & S Wholesale & Rentals, LLC PO Box 1104 Asheboro, NC 27204-1104

J C Pallet Company, Inc. PO Box 277 Barhamsville, VA 23011-0277

VIA CM/ECF EMAIL SERVICE ONLY J. Michael Fields Ward and Smith, PA PO Box 8088 Greenville, NC 27835-8088 J.H. Rose Logistics, LLC Dept 3127 PO Box 123127 Dallas, TX 75312-3127 John Bean Technologies Corp. 7009 Solutions Center Chicago, IL 60677-7000

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John Deere Financial 6400 NW 86th Street P.O. Box 6600 Johnston, IA 50131-6600

John Deere Financial P.O. Box 4450 Carol Stream, IL 60197-4450

P.O. Box 118

John Edwards Co., Inc. 5030 Smith Farm Road

Indian Trail, NC 28079-0118

John S. Connor, Inc. PO Box 791384

Baltimore, MD 21279-1384

Johnny Hope

305 Malpass Farm Lane

Clinton, NC 28328-6694

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Joshua Bailey 2450 HWY 403 & 50 Faison, NC 28341

Jowat Corporation

Coface North America Insurance Company 650 College Road East, Suite 2005

Princeton, NJ 08540-6779

Jowat Corporation PO Box 1368

High Point, NC 27261-1368

Keith Smith

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of Commerce PO Box 358

Kenansville, NC 28349-0358

Kevin J. Lee 383 Hinson Road Dunn, NC 28334-9586

Key Risk - StarNet Insurance Co.

PO Box 18746

Greensboro, NC 27419-8746

Kornegay Family Produce, LLC

610 Worley Road

Princeton, NC 27569-8342

Land Management Group, Inc. 3805 Wrightsville Avenue, Suite 15 Wilmington, NC 28403-8464

Le Bleu Central of Raleigh

PO Box 98479

Raleigh, NC 27624-8479

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Leslie Lane Mize

Nelson, Mullins, Riley & Scarborough, LLP

4140 Parklake Avenue GlenLake One, Suite 200 Raleigh, NC 27612-3723 Lewis Systems & Service Co., Inc.

140 N.Busines Court

Rocky Mount, NC 27804-6546

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Major Foy Ivey, Jr. 340 Daniel Chestnutt Road Mount Olive, NC 28365-5259

Matthew Rhodes

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Middlesex, NC 27557-8757

MegaCorp PO Box 1050

Wrightsville Beach, NC 28480-1050

Meuers Law Firm, P.L. 5395 Park Central Court Naples, FL 34109-5932

Michael Godwin 5904 Timothy Road

Dunn, NC 28334-7388

Mobile FarmWare, LLC 3164C Governor Moore Road

Clinton, NC 28328

Moore & Van Allen PLLC 430 Davis Drive, Suite 500

PO Box 13706

Research Triangle Park, NC 27709-3706

Morris & Associates 803 Morris Drive

Garner, NC 27529-4037

Nature's Way Farms Inc. 7795 Suttontown Road Faison, NC 28341-7267

Office Services Div., Bankruptcy Unit

PO Box 1168 Raleigh, NC 27602-1168

NC Department of Revenue

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NC Sweet Potato Commission 700 E. Parrish Dr., Suite C Benson, NC 27504-1759 North Carolina Dept. of Commerce Div. of Employment Security P.O. Box 26504 Raleigh, NC 27611-6504 North Carolina Dept. of Revenue Office Services Div-Bankruptcy Unit P.O. Box 1168 Raleigh, NC 27602-1168

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Patricia Linares 714 W. Main St. Faison, NC 28341-7560 Precythe Properties, LLC c/o John C. Hine, Executor P.O. Box 916 Goldsboro, NC 27533-0916 Professional Produce of Florida Inc. 2991 NW 112th Ave. Coral Springs, FL 33065-3545

Race-West Company Philip L. Cutler Building 600 South State Street Clarks Summit, PA 18411-1740 Randy S. Swartz 111 West Center Street N Faison, NC 28341-6124 Rankin Truck Brokers, LLC 159 Point South Drive Yemassee, SC 29945-9003

ReedTMS Logistics 615 S. Ware Blvd. Tampa, FL 33619-4444 Roadrunner Truckload Plus PO Box 95000 Chicago, IL 60694-5000

Robert Fann Farming 220 Oscar Tate Road Salemburg, NC 28385-8646

Rocky Mount Electric Motor PO Box 1063

Rocky Mount, NC 27802-1063

Ryder Transportation Services P.O. Box 402366

Atlanta, GA 30384-2366

RYDER TRUCK RENTAL INC ATTN: JENNIFER MORRIS 6000 WINDWARD PARKWAY ALPHARETTA, GA 30005-8882

S & E Farms, LLC 5075 Godwin Lake Road Benson, NC 27504-8520 Sampson County Tax Administrator

P.O. Box 207

Clinton, NC 28329-0207

Scotlynn USA Division, Inc. 1150 Vittoria Road Vittoria, ON N0E 1W0 Canada

Scott Farms, Inc. 7965-A Simpson Rd. Lucama, NC 27851-9371 Select Bank & Trust 863 Tilgham Dr. Dunn, NC 28334-5509 Sharp Farms, Inc 5161 NC Hwy 581 Sims, NC 27880-9435

Shred-it USA 28883 Network Place Chicago, IL 60673-1288 Southeast Produce Council, Inc. 315 Hwy 17 North Millen, GA 30442-8119

PO Box 63001 Charlotte, NC 28263-3001

Southern Bank

Southern Produce Distributors, Inc. 111 West Center Street North Faison, NC 28341-6124 Steven C. Johnson 5417 US 13 South Mount Olive, NC 28365-7675 Strickland Farming Partnership 671 Hollingsworth Road Mount Olive, NC 28365-8967

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Thermal Techniques 1409 East Blvd. Charlotte, NC 28203-5817

Tires Inc. 317 South East Blvd. Clinton, NC 28328-3625

Tew Farms

4210 North NC 903

Albertson, NC 28508-9545

Tony D. Lee 957 White Oak Road Four Oaks, NC 27524-8158 **Total Quality Logisitics** PO Box 634558 Cincinnati, OH 45263-4558

Toyota Industries Commercial Financ P.O. Box 660926 Dallas, TX 75266-0926

TRAFFIX 1-375 Wheelabrator Way Milton, ON L9T 3C1

Canada

Transit Transportation Services 616 Industrial Ave,

Mount Pleasant, MI 48858-4642

Tri-Lift, NC Inc. 2905 Manufacturers Road Greensboro, NC 27406-4605

TriEast Irrigation PO Box 1147

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Warren Farming Partnership

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Waste Industries PO Box 791519

Baltimore, MD 21279-1519

Waters Agricultural Labs. Inc. 257 Newton Hwy.

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Wayne E. Bailey Produce Co.

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Chadbourn, NC 28431-0467

West Carroll Parish Tax Assessor

PO Box 610

Oak Grove, LA 71263-0610

West Farms

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Westmark Industries, Inc. 6701 SW McEwan Road Lake Oswego, OR 97035-7815

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